Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)
	)
Qwest Communications	)
International Inc.	) WC Docket No. 03-90
	)
Consolidated Application for Authority	)
to Provide In-Region, InterLATA Services	)
in the State of Minnesota	)

REPLY DECLARATION OF LYNN M V NOTARIANNI
& CHRISTIE L. DOHERTY

Checklist Item 2 of Section 271(c)(2)(B)
Operations Support Systems

Table of Exhibits

TAB	REPLY EXHIBIT NO.	DESCRIPTION
1	Conf. Reply Exh. LN-1 *Redacted for Public Inspection*	Qwest April 3, 2003, Ex Parte - Contains Confidential Data
2	Reply Exh. CLD-2	Qwest April 11B, 2003, Ex Parte
3	Reply Exh. CLD-3	Breakdown of "Traditional" and "Star" Volumes for UNE-P-POTS and UNE-P-Centrex in Minnesota, November 2002 - March 2003
4	Conf. Reply Exh. CLD-4 *Redacted for Public Inspection*	Description of CLECs that Currently Receive BOS Bills - Contains Confidential Data
5	Conf. Reply Exh. CLD-5 *Redacted for Public Inspection*	BI-3A Results for BOS Bills From November 2002 Through March 2003 - Contains Confidential Data

EXHIBIT 1

Confidential Reply Exhibit LN-1
Qwest April 3, 2003, Ex Parte – Contains Confidential Data
Redacted for Public Inspection

Qwest.

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April 3, 2003

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EX PARTE

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S. W.
Washington, D.C. 20554

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

> Re: **Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in New Mexico, Oregon and South Dakota; WC Docket No. 03-11**

Dear Ms. Dortch:

The purpose of this letter is to respond, at the request of Commission staff, to three recent *ex parte* filings made by WorldCom in the above-referenced proceeding. [1] In those letters WorldCom blames its current difficulties in ramping up its UNE-P-based residential offerings in the Qwest region on alleged deficiencies in Qwest's Operations Support Systems (OSS), Qwest's documentation for building EDI interfaces, and the technical assistance it receives from Qwest.

Upon close examination, the Commission will find nothing in WorldCom's complaints that calls into question the Commission's previous conclusion that Qwest's OSS, EDI documentation, and technical assistance fully satisfy Section 271. For the most part WorldCom's recent *ex parte* filings recycle arguments previously made -- and fully responded to by Qwest -- earlier in this proceeding. In many instances, the claims raised by WorldCom were already acted on, and dismissed by, the Commission in the *Qwest 271 Order*. [2] In other cases the matters already have been resolved between the companies.

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[1]   *See* WorldCom *ex parte* filings of March 24, 2003 ("WorldCom March 24 Ex Parte"), March 27, 2003 ("WorldCom March 27 Ex Parte"), and April 1, 2003 ("WorldCom April 1 Ex Parte"). The *ex partes* filed on March 27 and April 1 contained substantially the same arguments as WorldCom's filing on March 24.

[2]   *See Application by Qwest Communications International, Inc,. for Authorization to Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming,* WC Docket No. 02-314. Memorandum Opinion and Order, FCC 02-332, 17 FCC Rcd 26303 (rel. December 23, 2002) (*"Qwest 271 Order"*).

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Nevertheless, Qwest fully addresses each one of WorldCom's latest allegations in Attachment A to this letter.[3] As we explain there in detail, WorldCom's difficulties cannot fairly be laid at Qwest's doorstep. WorldCom points primarily to its initial reject rates for UNE-P, and claims that these problems are Qwest's fault. This is wrong and unfair. To begin with, Qwest has demonstrated that both its overall reject rates and CLEC-specific reject rates meet or exceed the rates reported by other BOCs that have received Section 271 approval.[4] In addition, the Commission has recognized many times that orders can fail for many reasons having nothing to do with the BOC and its OSS.[5] This fact similarly is reflected in the structure of OSS tests and related performance measures, including post-entry performance plans. These evaluations do not look to reject rates in recognition of the fact that orders can -- and often do -- reject even if the BOC system is performing well; the CLEC bears responsibility at its end too.

In that regard, we note WorldCom's *ex parte* of yesterday, in which the company corrects previous statements on this matter. WorldCom explains that it has not actually stopped outbound telemarketing, as it had previously stated to the Commission. In addition to this correction, WorldCom acknowledges improvements in its order-processing experience.[6] Qwest is glad to see this improvement, which further confirms that its OSS meets the requirements of the Telecommunications Act, and the Commission's precedent under Section 271.

WorldCom's other specific complaints also evaporate on close review, as detailed in the point-by-point response in Attachment A. However, several general points bear particular emphasis:

First, the real world experience of other CLECs belies WorldCom's claim that its efforts to build an interface to order UNE-P POTS is exposing problems in Qwest's OSS and EDI documentation that were not apparent before. A number of other CLECs have successfully built and used EDI interfaces to order significant volumes of UNE-P POTS or Resale POTS, including conversion-as-specified orders (*i.e.* orders with feature detail). These CLECs have experienced much lower reject rates than WorldCom.[7] Hewlett-Packard (HP), the pseudo-CLEC in the Third Party Test, was similarly successful in constructing an EDI interface for this purpose capable of handling material volumes.[8] This evidence undercuts WorldCom's argument

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[3]   For the convenience of staff, Attachment A to this letter responds to WorldCom's arguments using the same structure set forth in the WorldCom March 24 Ex Parte. The other attachments to this letter are actually attachments to Attachment A, and are labeled Attachment A1, A2, and so on.

[4]   *See* Qwest IV Performance Measures Declaration at ¶¶ 163-182.

[5]   *See, e.g., Qwest 271 Order* at ¶ 89 (rejecting allegations that Qwest's overall reject rates indicate systemic OSS problems based on the fact that "Qwest's overall reject rates are within the range the Commission previously found acceptable" and the fact that "a number of competing CLECs experience low reject rates"); *Georgia Louisiana 271 Order* at ¶ 142 (noting that claims of high reject rates may not be entirely attributable to BellSouth); *New York 271 Order* at ¶ 175 (finding that wide variation in CLEC-specific reject rates is likely attributable to CLEC, not BOC, conduct).

[6]   *See* WorldCom *ex parte* filing of April 2, 2003 ("WorldCom April 2 Ex Parte").

[7]   *See* Attachment A, at 1-2, and Confidential Attachment A1 (CLEC EDI UNE-P POTS and Resale POTS Conversion-as-Specified Order Transactions from February 1, 2002, through January 31, 2003).

[8]   Attachment A at 2 and n.6.

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that its own reject rates are attributable to deficiencies in Qwest's OSS and EDI documentation for UNE-P POTS, or to the fact that WorldCom is attempting to process conversion-as-specified orders. [9]

Second, WorldCom erroneously finds fault with Qwest for using allegedly "complex" or "non-standard" OSS systems, and blames many of its problems on that issue. This apparently reflects WorldCom's position that Qwest's systems should be set up in a particular way, or should be designed the same as those of other BOCs. There is no foundation for this complaint. Qwest's OSS reflects its own systems and the way that it processes orders for itself. Qwest is not required to conform to other RBOC systems; Qwest is free to develop OSS based on its own systems, and do so in a manner that best and most efficiently meets its own needs, CLEC needs, and the Act's requirements. Yet when WorldCom developed its EDI interface, it apparently made assumptions about Qwest's OSS -- including assumptions that it would work the same way as that of certain other BOCs, when in fact some of Qwest's processes are different. Significantly, other CLECs generally did not make these same assumptions, and Qwest had no reason to anticipate that WorldCom would either.

Third, and contributing to WorldCom's problems, that company apparently did not always use, or misinterpreted, the EDI documentation that Qwest recommended for CLECs building interfaces. That documentation has been examined and proved out both in trials and in real life. It is significant that other CLECs, as well as HP in the Third Party Test, have successfully used Qwest's EDI documentation to build EDI interfaces. HP also thoroughly tested and approved Qwest's OSS, EDI documentation, and technical assistance, over a wide range of products, including UNE-P POTS provided over EDI interfaces. [10] The Commission in prior Section 271 proceedings has considered this type of commercial and third party test evidence to be strong proof that a BOC's EDI documentation and technical assistance is adequate under Section 271. And the Commission made this specific finding in the *Qwest 271 Order* with respect to Qwest's OSS. [11]

Fourth, contrary to WorldCom's implication, Qwest has worked hard to assist WorldCom in its efforts to develop and test its EDI interfaces for UNE-P POTS and other products, and continues to work with WorldCom to resolve any remaining problems or questions. Indeed, Qwest's efforts have gone well beyond what Qwest is obliged to do as a Section 271 matter. Qwest has devoted significant resources to help WorldCom, as is evident from the attached response. [12] Since WorldCom began progression testing in SATE, and continuing through production turnup, Qwest conducted weekly EDI implementation meetings with WorldCom, generally with five Qwest staff members attending. Also since that time, and through the present, Qwest has been conducting weekly process meetings with WorldCom, with at least three staff in attendance. Once WorldCom went into production, Qwest began conducting operations meetings with WorldCom on a frequent basis as needed to resolve issues,

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[9]   *See* WorldCom March 24 Ex Parte at 1-2.

[10]   Attachment A at 2 and n.6.

[11]   *Qwest 271 Order* at ¶ 144.

[12]   Attachment A at 2-3.

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with five or more staff in attendance. These various types of meetings range from an hour to three hours in length, and are conducted either in person or by phone. For each type of meeting, question logs are maintained, and these have extensive entries.[13] In addition, Qwest Wholesale conducts regular executive meetings with WorldCom. Qwest's production support process and other post-production technical assistance also helps CLECs who are in production.[14] Clearly, Qwest devotes substantial time, attention, and expertise to resolving WorldCom's questions and issues.

Fifth, the WorldCom *ex parte* actually demonstrates that the OSS process is evolving and working as it should. As discussed above, the systems as they stand already have been shown to permit CLECs to compete with significant volumes. WorldCom takes out of context some minor system bugs and documentation ambiguities -- inevitable in the evolution of any IT process -- and tries to portray them as far more significant than they actually are. This is not to say that Qwest dismisses such issues. The company always wants to improve. But the record here shows that Qwest has been responsive to CLEC concerns, and has worked hard to ensure that its OSS and documentation works as well for CLECs as it possibly can. As detailed in Attachment A, Qwest has acted promptly to implement OSS fixes or adopt clarifications to its documentation whenever WorldCom or other CLECs have identified issues, both significant and minor. While most of the complaints voiced by WorldCom in its ex parte are ultimately groundless, Qwest's diligence in acting in response to any real issues is clear.

Sixth, and equally important, there is an established procedure in place -- the collaborative Change Management Process (CMP) -- to decide the significance and timing of potential improvements and modifications to Qwest's OSS.[15] Just because WorldCom objects to an aspect of Qwest OSS does not mean that a change should be made, or made now. Other CLECs may prefer the status quo because their systems are working well without the need for a change, or they may have other priorities. WorldCom actively participated in creating the CMP, and should use that process here. The CMP process is specifically established to enable Qwest and CLECs, including WorldCom, to work on a collaborative basis to propose changes to Qwest's interfaces, products, or processes. To the extent WorldCom or other CLECs are interested in changing the way the Qwest systems work, or in making changes in Qwest documentation, the CMP provides the appropriate forum. In fact, many of the issues identified by WorldCom have been or are being considered in the change management process, as is appropriate given the potential implications of such changes to Qwest's systems on the business operations of all CLECs. The CMP Framework also prescribes a production support process that Qwest must follow in handling troubles identified by CLECs after they go into production, a process that CLECs, including WorldCom, can use here. WorldCom in some respects is complaining that Qwest is not going out of process to modify systems and documentation as WorldCom would prefer, at the expense of standard procedures that Qwest is bound to other CLECs to follow.

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[13]   Several excerpts from the question logs are included as confidential attachments hereto.

[14]   *See* Qwest IV OSS Declaration at ¶¶ 630-632, 656-657, 663-664.

[15]   *See generally* Qwest IV Change Management Declaration.

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Seventh, the Commission should note that, in many respects, Qwest is being asked to prove a negative without the facts. Qwest cannot always know why WorldCom has had problems with its orders. Perhaps the company rushed its systems into full production before they were as ready as they should have been. Perhaps many of the problems arise from erroneous assumptions regarding "typical" OSS or documentation. Many of WorldCom's problems may have nothing to do with Qwest's OSS. Qwest has worked hard to help WorldCom correct its systems, and is glad to see that WorldCom is showing progress. Qwest will continue to assist WorldCom in every way it reasonably can. But it will not accept unfair attacks on an OSS system -- and associated processes and procedures -- that have proven out in third party tests and real world experience.

In sum, for the reasons given above and in the attached detailed response, WorldCom has presented no reason for the Commission to depart from its conclusion in the *Qwest 271 Order* that Qwest is meeting the requirements of Section 271 today. None of WorldCom's allegations reveals significant deficiencies in Qwest's OSS, its EDI documentation, or its technical assistance. Qwest is serious in its commitment to continue its support for WorldCom efforts to make its interface work more smoothly with Qwest's OSS, and to enable WorldCom to provide UNE-P POTS and other services throughout the region with a minimum of problems.

Representatives of Qwest met yesterday with Commission staff to discuss these issues. [16] At that meeting, Qwest provided Commission staff with responses to the specific issues raised by WorldCom in its recent *ex parte* filings. The information provided to Commission staff can be found in Attachment A to this letter.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

/s/

Dan Poole

cc (with Attachment A only):   M. Brill
D. Gonzalez
C. Libertelli
J. Rosenworcel
E. Willeford
L. Zaina
B. Maher
R. Lerner

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[16]   Attending the meeting on behalf of Qwest were Andrew Crain, Hance Haney, Loretta Huff, Lynn Notarianni, Dan Poole and Chris Viveros, as well as Linda Oliver and Yaron Dori of Hogan & Hartson. Commission staff in attendance included Michelle Carey, Gail Cohen, Bill Dever, Christi Shewman and Jeff Tignor.

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cc: (with all attachments):   M. Carey
K. Cook
W. Dever
G. Cohen
G. Remondino
K. Shewman
J. Tignor
J. Myles
K. Brown
R. Harsch
H. Best
D. Booth
K. Cremer
A. Medeiros
R. Weist

ATTACHMENT A

Qwest Detailed Response to WorldCom's March 24, 2003, Ex Parte

I. ADEQUACY OF QWEST'S DOCUMENTATION AND TECHNICAL ASSISTANCE FOR EDI DEVELOPMENT

As Qwest explained in its Application, a total of 31 CLECs have successfully developed EDI interfaces and gone into production using Qwest's EDI documentation. As the Commission has stated on numerous occasions, including in the *Qwest 271 Order*, evidence that CLECs have successfully built EDI interfaces using a BOC's documentation is the strongest evidence that such documentation is adequate under Section 271. [1] As Qwest stated in its Qwest IV Reply Comments, and as discussed below, for the most part the instances cited by WorldCom involve situations in which WorldCom interpreted Qwest's EDI documentation in a way that other CLECs had not, and that Qwest had not anticipated, and do not constitute evidence of significant problems with Qwest's documentation or technical assistance. [2]

Eight CLECs have certified and used their EDI interfaces to provide either UNE-P POTS and/or Resale POTS, both of which products would typically include feature detail in the orders. [3] Of these, a number have done so with reject rates for UNE-P POTS and/or Resale POTS significantly lower that those experienced by WorldCom and Z-Tel. [4] This evidence demonstrates that, contrary to WorldCom's contention, Qwest's EDI documentation and technical assistance is adequate to permit CLECs to successfully build EDI interfaces for all products, including those that WorldCom is providing now, and that WorldCom's own experience is not indicative of significant problems with either Qwest's

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[1] *Application by Qwest Communications International, Inc,. for Authorization to Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming,* WC Docket No. 02-314, Memorandum Opinion and Order, FCC 02-332, 17 FCC Rcd 26303 (released December 23, 2002), at ¶ 144 (hereinafter *"Qwest 271 Order"*).

[2] Qwest Reply Comments at 25; Reply Declaration of Lynn M V Notarianni and Christie M. Doherty in WC Docket No. 03-11 at ¶ 10 ("Qwest IV OSS Reply Declaration").

[3] *See* Declaration of Lynn M V Notarianni and Christie M. Doherty on OSS in WC Docket No. 03-11 at ¶¶ 612, 633 ("Qwest IV OSS Declaration"), Confidential Exhibit LN-OSS-138 (Number of CLECs Certification Testing in Interoperability Environment and SATE, as of December1, 2002); Qwest IV OSS Reply Declaration at ¶¶ 5, 8.

[4] *See* Confidential Attachment A1 (CLEC EDI UNE-P POTS and Resale POTS Conversion-as-Specified Orders Submitted from February 1, 2002 through January 31, 2003); Confidential Attachment A2 (PO-4B Reject Rates for Selected CLECs). The latter exhibit contains reject rates for those CLECs listed in the former exhibit that had significant volumes. High reject rates, such as those WorldCom alleges it has experienced in ordering UNE-P, can be attributable to many factors, including problems that have nothing to do with a BOC's OSS or the quality of its documentation. Nor can high reject rates necessarily be attributed to the submission of high LSR volumes. As shown in the Declaration of Michael G. Williams on Performance in WC Docket No. 03-11 ("Qwest IV Performance Declaration") at ¶¶ 167-182, a number of CLECs with high volumes have achieved relatively low reject rates.

documentation or its technical assistance. [5] This conclusion is bolstered by the fact that Hewlett-Packard (HP), the pseudo-CLEC in the ROC Third Party Test, successfully built EDI interfaces for UNE-P POTS, and transmitted significant volumes over those interfaces, with reject rates of 12.5 percent during the four months between January and April 2002. [6] Finally, as shown in a confidential attachment to this filing, the results of AT&T's UNE-P trial in Minnesota also support the adequacy of Qwest's EDI documentation in this regard. [7]

WorldCom also states that it had submitted, in conjunction with its partner Z-Tel, at least 45,000 of the 69,000 EDI Resale POTS and UNE-P POTS conversion orders submitted via EDI during the 12-month period ending January 31, 2003. [8] Although it was not clearly stated, the 69,000 figure cited by Qwest in its OSS Reply Declaration included only those conversion orders with feature changes (only migration-as-specified conversion orders). [9] As shown in a confidential attachment to this *ex parte*, Z-Tel's share of this total is significantly less than the 45,000 orders cited by WorldCom. [10] As is also shown in the confidential attachment, other CLECs transmitted significant volumes of Resale POTS or UNE-P POTS conversion-as-specified orders via EDI during this same time period. [11] WorldCom's assertion to the contrary is thus incorrect. [12]

WorldCom also contends that Qwest's technical assistance is deficient under Section 271. Nothing could be further from the truth. Qwest has worked hard to assist WorldCom in its efforts to develop and test its OSS interfaces for UNE-P POTS and

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[5] WorldCom states that Z-Tel "had many problems in developing its interfaces as a result of the undocumented complexities in Qwest's systems," pointing without citation to WorldCom's comments on prior Qwest applications. WorldCom March 24 Ex Parte at 2. WorldCom first raised EDI documentation issues in its Comments on Qwest's third Section 271 Application (the nine-state application). As Qwest explained in its Reply Comments in that proceeding, and as the FCC concluded, evidence provided there with regard to Z-Tel's experience did not undercut the adequacy of Qwest's EDI documentation or its technical assistance. *See Qwest 271 Order* at ¶¶ 49-56; Qwest III Reply Comments at ¶¶ 156-160..

[6] *See* Qwest I Ex Parte, filed July 29A, 2002, in WC Docket No. 02-148 (stating that HP successfully submitted a total of 889 UNE-P retest orders via its integrated IMA-EDI interface, with a 12.15 % reject rate). A copy of this *ex parte*, appropriately redacted, is attached hereto as Attachment A3. *See also* Qwest IV OSS Reply Declaration at ¶¶ 6-7. *See also* KPMG Final Report at 66, Test 12, Table 12-3 (HP Functionality Test scenarios included UNE-P Residential and Business POTS migration-as-specified orders); at 154, Test 13, Table 13-2 (same for HP Flow Through Test); and at 254, Test 15, Table 15-3 (same for HP Volume Test).

[7] *See* Confidential Attachment A4 (Orders Submitted by AT&T for Conversion-As-Specified for UNE-P and Excerpt from December 24, 2001 Performance Results of AT&T UNE-P Trial in Minnesota).

[8] WorldCom March 24 Ex Parte at 2, citing Qwest IV OSS Reply Declaration at ¶ 8.

[9] Qwest IV OSS Reply Declaration at ¶ 8. The breakdown of CLECs and volumes within the 69,000 total is set forth in Confidential Attachment A1 (CLEC EDI UNE-P POTS and Resale POTS Conversion-as-Specified Orders Submitted from February 1, 2002 through January 31, 2003).

[10] *Id.* (Confidential Attachment A1).

[11] *Id.*

[12] WorldCom March 24 Ex Parte at 2.

other products, and continues to work with WorldCom to resolve any remaining problems or questions. Qwest has devoted significant resources to this effort. Since WorldCom began progression testing in SATE, and continuing through production turnup, Qwest conducted weekly EDI implementation meetings with WorldCom, generally with five Qwest staff members attending. Also since that time, and through the present, Qwest has been conducting weekly process meetings with WorldCom, with at least three staff in attendance. Once WorldCom went into production, Qwest began conducting operations meetings with WorldCom on a frequent basis as needed to resolve issues, with five or more staff in attendance. These various types of meetings range from an hour to three hours in length, and are conducted either in person or by phone. For each type of meeting, question logs are maintained, and these have extensive entries.[13] In addition, Qwest Wholesale conducts regular executive meetings with WorldCom. Qwest's production support process and other post-production technical assistance also helps CLECs who are in production.[14] Clearly, Qwest devotes substantial time, attention, and expertise to resolving WorldCom's questions and issues.

A.   Rejects Related to Features

1.   Feature Identification for Single-line Customers

In its initial and reply comments, and again in its March 24 Ex Parte, WorldCom argues that Qwest failed adequately to disclose in its EDI documentation that single-line and multi-line CSRs would treat "feature detail" (telephone numbers) differently.[15] This argument was fully addressed in Qwest's Reply Comments. As explained there and in the OSS Reply Declaration, the CSR for a single-line account typically does not include the telephone number next to each feature, since the assumption is that for single-line accounts, the same telephone number would be associated with each feature, and thus the telephone number is not needed by each feature.[16] For multi-line accounts, in contrast, the telephone number is typically associated with each feature, because more than one telephone number is on the account.

As noted in the Qwest IV Reply Comments, on March 10, 2003, Qwest implemented a change to the PCAT that adds clarifying information regarding the different treatment of feature detail in single-line and multi-line CSRs.[17] This change was made

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[13]   Several excerpts from the question logs are included as confidential attachments hereto.

[14]   *See* Qwest IV OSS Declaration at ¶¶ 630-632, 656-657, 663-664.

[15]   *See* WorldCom March 24 Ex Parte at 2-3; WorldCom IV Reply Comments at 2-3, Lichtenberg Reply Declaration at ¶¶ 7-8; WorldCom IV Comments at 10.

[16]   Qwest IV Reply Comments at 31-33; Qwest IV OSS Reply Declaration at ¶¶ 15-18.

[17]   Qwest IV Reply Comments at 33; Qwest IV OSS Reply Declaration at ¶ 18. The following language was added to the PCAT:

> CSRs that contain multiple telephone lines will identify which line each
> Universal Service Order Code (USOC) is associated with by listing the
> TN and Field Identifier (FID) detail following the individual USOC.

through Qwest change management procedures, after notification and solicitation of comment from CLECs. To the extent there has been any confusion regarding the feature identification issue, this PCAT change should eliminate it.

Moreover, and contrary to WorldCom's assertion in its March 24 Ex Parte, the organization of feature detail in Qwest's single-line and multi-line CSRs is entirely logical. [17] As discussed in Qwest's OSS Reply Declaration, this is why the EDI documentation describes feature detail as "optional." [19] Labeling feature detail "optional" means that a feature may appear on a CSR without feature detail (*i.e.*, without the telephone number). The definition of the term "optional" in the Developer Worksheets (which Qwest instructs CLECs to use in developing their EDI interfaces) makes this clear. "Optional" is there defined as follows: "Optional – This field is optional for this activity, for this product. The system shall not enforce any business rules and should allow a valid entry." [20] In other words, for fields labeled "optional," the system may not populate the field for Qwest-sent transactions, or will not reject the submission if the field is blank for CLEC-sent transactions. However, if the field contains an entry, the system will populate or use the information if appropriate. In contrast, the designation "not required" means that the field will not and should not ever be populated. [21] WorldCom states that "the optional nature of the feature detail would suggest that the telephone number would not be included in feature detail for any accounts . . ." WorldCom thus appears to be incorrectly reading the term "optional" more like the term "not required." If a field were never populated, it would be labeled "not required," as opposed to "optional."

2. Feature Identification for Multi-line Accounts

WorldCom also criticizes Qwest's organization of feature information on the CSR for multi-line accounts. [22] In its Reply Comments, WorldCom alleged that because SATE had only one out-of-sequence multi-line CSR test scenario, WorldCom did not discover a defect in its EDI interface until it was in production. [23]

CSRs that contain only one line generally do not contain the TN FID detail following the individual USOC. All USOCs in the single line account are associated with the TN contained in the account number.

See PCAT (Pre-Ordering Overview). This document is available at www.qwest.com/wholesale/clecs/preordering.html.

[18]   WorldCom March 24 Ex Parte at 3.

[19]   Qwest IV Reply Comments at 32; Qwest IV Reply Declaration at ¶ 16.

[20]   *See* Developer Worksheets in IMA Disclosure Document, Qwest IV, Att. 5, App. P (Qwest EDI Disclosure Document, Version 10.0) at Chapter 02, p. 6 ("EDI Introduction") This document may be found on the Qwest website at the following URL: www.uswest.com/disclosures/netdisclosure409.html.

[21]   The definition of "Not Required" in the Developer Worksheets is as follows: "Not Required – This field is not required for this activity, for this product. If the indicator is (N) for all activities, Qwest does not map the field and will return a –997 if populated." *Id.*

[22]   WorldCom March 24 Ex Parte at 3-4.

[23]   WorldCom Qwest IV Reply Comments at 4; Lichtenberg Reply Decl. at ¶¶ 10-14.

Apparently in coding its EDI interface, WorldCom initially assumed that all feature information for a particular telephone number would be listed together. In fact, however, Qwest's CSRs do not organize feature information in this way. Each feature has a TN associated with it, but the features themselves are not necessarily grouped by TN on the CSR. This is the way CSRs exist in Qwest's legacy systems (BOSS/CARS). The Department of Justice addressed the issue of the orientation of the CSR by USOCs rather than by TN in its evaluation in Qwest II, and did not view it as a problem under Section 271. [24] HP also successfully developed an EDI interface for ordering UNE-P POTS and Resale POTS using Qwest documentation and technical assistance. [25]

In December 2002, Qwest added a multi-line account test scenario to SATE for WorldCom with features listed "out-of-sequence." This test scenario, which WorldCom successfully ran for both pre-order and order functionalities in SATE regression testing, should have provided WorldCom adequate opportunity to discover that defect in its EDI interface design. Further information about WorldCom's experience with feature identification is set forth in a confidential attachment hereto. [26] Moreover, on February 27, 2003, AT&T introduced a change request to enhance EDI to provide a CSR with a TN orientation. [27] This CR has been given a Level of Effort and has been scheduled for prioritization for possible inclusion in IMA release 14.0.

3. Forward-to Numbers

In its Qwest IV Reply Comments, Qwest fully addressed WorldCom's argument regarding the requirement that ten digit "forward to" numbers from old CSRs be used on orders, even if the old forward-to number is seven digits. [28] There, Qwest pointed out that its documentation specifies that ten digit feature detail is required to accompany call forwarding USOCs. [29] Qwest also noted in its Reply Comments the existence of a pending CR, originally planned for inclusion in IMA release 12.0, that would relax the edit

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[24]   *See* Evaluation of Department of Justice in WC Docket No. 02-189 (filed August 21, 2002), at 11 & n. 46 ("Although a less complicated organization may be preferable for use in AT&T's own systems, it does not appear to preclude the full and successful integration of pre-order and order functions for all CLECs.")

[25]   *See* Letter from Geoff May, Hewlett-Packard, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 02-148 (filed August 6, 2002) at Attachment, p. 2. This *ex parte* is included with this filing as Attachment A5.

[26]   *See* Confidential Attachment A6 (WorldCom's Experience with CSR Feature Identification Issues (Confidential – Subject to Protective Order)).

[27]   *See* SCR022703-04 (Support of Structured and Parsed CSR). Information on this CR is available at the following URL: www.qwest.com/wholesale/cmp/changerequest.html.

[28]   Qwest IV Reply Comments at 33-35; OSS Reply Declaration at ¶¶ 19-21. *See also* Qwest March 7B Ex Parte.

[29]   Qwest IV Reply Comments at 33-35; OSS Reply Declaration at ¶ 19 and n.30, citing Qwest IV, Att. 5, App. P (Qwest EDI Disclosure Document) at Appendix C, p. 125, reference line 60, *also available at* www.uswest.com/disclosures/netdisclosure409.html.

that currently requires the use of a ten digit forward-to number. Qwest implemented this CR on an expedited basis on February 28, 2003, for IMA releases 10.0 and 11.0, and it will be included in release 12.0. [30] That CR, submitted by Eschelon in July 2002, should have put WorldCom on notice that CSRs sometimes included seven digit forward-to numbers. Even though it was initially filed as a GUI CR, after the clarification meeting it was converted to an "IMA Common" CR, meaning that it would apply to both GUI and EDI, and this fact was announced at the July 2002 Systems CMP meeting. [31] Finally, the planned implementation on April 7, 2003, of a "Migrate-as-Specified" feature for release 12.0 would also eliminate the need to provide old "forward-to" numbers. [32]

4. Table Updates

Qwest fully responded to this allegation regarding tables for touchtone USOCs in Oregon in its Reply Comments and Reply Declaration, and WorldCom presents no new issues in its *ex parte*. [33]

5. Missing USOCs

WorldCom argues that Qwest's EDI documentation is inadequate because Qwest has failed to provide it with "a table of valid class-of-service Universal Service Order Codes (USOCs) at the account level." [34] To clarify, CLECs are required to provide *line* level USOCs, not *account* level USOCs, when submitting LSRs. In early February, WorldCom requested a list of the "most frequent line USOCs by product." Qwest responded to that request by accessing information from the Qwest "USOC FID Finder" tool, which is available on Qwest's external website, and the subject was closed. [35]

As WorldCom correctly states, Qwest directs CLECs to use the "USOC FID Finder" if a CLEC needs to identify a particular USOC. [36] WorldCom acknowledges that this "web-based tool enables CLECs to identify the purpose of a USOC by typing in the USOC." [37] But WorldCom contends that the USOC/FID Finder is inadequate because

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[30]   Qwest IV OSS Reply Declaration at ¶ 20.

[31]   *See* Qwest IV OSS Reply Declaration, Reply Exhibit LN-3 (Excerpt from Systems Interactive Report for SCR062702-09ES, Relaxing the Edit on Ten Digit "Forward To" Numbers), *also available at* www.qwest.com/wholesale/cmp/changerequest.html.

[32]   Qwest IV OSS Reply Declaration at ¶ 21.

[33]   Qwest IV Reply Comments at 35-37; OSS Reply Declaration at ¶¶ 22-26.

[34]   *See* WorldCom March 24 Ex Parte at 4-5. The request for a complete table for class of service USOCs was not formally requested through the on-going operational support process until March 27, 2003.

[35]   *See* Confidential Attachment A7 (Excerpt from Closed Qwest Post-Launch Issues Log, Stare and Compare Section, Issue 4. The USOC FID Finder can be found at: http://usocfidfind.qwest.com.

[36]   A "FID" is a Field Identifier. It is used to identify attributes of service beyond those described by the USOCs.

[37]   *See* WorldCom March 24 Ex Parte at 4-5.

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"it does not provide the list of USOCs in the first place." [38] However, CLECs can access the tool directly through Qwest's Wholesale Website to identify any USOC that is not known to them. The USOC/FID Finder tool provides CLECs the ability to query by specific USOC or FID code, as well as by Product Family. [39] The Product Family capability of this tool allows WorldCom to select a product family, such as "Residential Lines," select a product within that family, such as "Residence Lines – Flat" or "Residence Lines – Measured," and obtain a list of the USOCs associated with that product. This tool permits WorldCom to identify the USOCs that it can expect to see on the CSR based on the types of Qwest Retail customers that it anticipates converting to WorldCom service.

WorldCom also complains that CLECs can enter only one USOC at a time into the USOC/FID Finder, and that the tool "tends to crash." [40] If WorldCom experienced problems with the USOC/FID Finder, it should have contacted the Wholesale Systems Help Desk to submit a trouble ticket. No problems have been logged by any CLEC this year for the USOC/FID Finder and Qwest is unaware of any systemic lack of stability in this tool.

In summary, WorldCom made a formal request for a complete table of class-of-service USOC codes only last Thursday; there is a publicly available web-based tool that provides lists of USOC for products within a product family; and there is no evidence of instability in that tool.

B.   Rejects Related to Addresses

1.   CALA Codes

WorldCom claims that Qwest should not require CLECs to provide Customer Address Location Area ("CALA") codes and that Qwest's documentation regarding use of these codes has caused confusion for WorldCom and other CLECs. [41]

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[38]   *Id.*

[39]   As stated in the USOC/FID Finder on the Qwest Wholesale Website:

> Qwest uses USOCs and FIDs to process your service request. Use the
> USOC/FID Finder as your source to identify USOC and FID details for
> all Qwest products and services. With the USOC/FID Finder you can
> perform the following:
>
> - FID Search to review Qwest FID information.
> - USOC Search for Qwest USOC information.
> - Product Family List to display category listings of all Qwest Product Families and
>   associated product offerings.

See http://usocfidfind.qwest.com/.

[40]   WorldCom March 24 Ex Parte at 5.

[41]   *See id.*, referencing WorldCom Reply Comments.

A CALA is a geographic region, used by Qwest systems, which may not be coextensive with the geographic area covered by a zip code. Qwest requires CLECs to specify the CALA code instead of the zip code when submitting LSRs under certain circumstances. CALA codes are required when the zip code is not provided on the LSR or a zip code crosses multiple CALAs. Qwest's EDI documentation clearly and specifically explains when CALA codes are required. Information regarding CALA code requirements appears in the IMA Disclosure Document and in the PCAT. [42]

WorldCom also argues that the CALA rule is confusing. However, the plain language of the business rule in the developer worksheets of the IMA Disclosure Document makes it clear that CALA codes must be provided either when no zip code is specified *or* when the zip code crosses CALA boundaries. [43] WorldCom's preference for the use of zip codes instead of CALA codes simply is not a Section 271 requirement. Finally, we note that once Migrate-by-TN is implemented on April 7, 2003, for IMA 12.0, the CALA codes need not be provided, because no address validation will be required for these LSRs. [44]

2. Database Mismatches

WorldCom claims "that there are substantial mismatches between Qwest's PREMIS and CRIS databases" that prevent CLECs from determining the appropriate service address for LSRs, and "that the information Qwest has provided leaves CLECs unsure which one they should use." [45] This issue relates specifically to IMA Release 12.0 functionality, which could not prevent WorldCom today from appropriately determining the service address for LSRs it currently submits in IMA Release 10.0. In any event, Qwest and WorldCom already resolved the general issue regarding which information to use for service address when Qwest confirmed that WorldCom could continue to provide validated addresses using PREMIS on LSRs submitted in IMA Release 12.0. [46]

WorldCom claims that the 12.0 migrate by TN and SANO [47] functionality Qwest plans to implement in April will create CLEC confusion because the functionality

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[42]   *See* Qwest EDI Disclosure Document, IMA-EDI Disclosure Document, Version 10.0, Att. 5, App. P, Chapter 4, at 2-4, and Developer Worksheets, App. B (End User Form for Product 25 – UNE-P), at 9 (Field EU-28) and 10 (EU-28a). *See also* PCAT (Pre-Ordering Overview) (Implementation Section). This document is available at www.qwest.com/wholesale/clecs/preordering.html.

[43]   *See* Qwest EDI Disclosure Document, Developer Worksheets, App. B (End User Form for Product 25 – UNE-P), at 9 (EU-28) and 10 (EU-28a), which states: "Zip (EU-28) – Product 25 – Required if CALA is not provided. CALA (EU-28a) – Product 25 – Required if ZIP is not provided or if the ZIP crosses multiple CALAs."

[44]   Migration-by-TN equally applies to Conversion-as-Is and Conversion-as-Specified Requests.

[45]   *See* WorldCom March 24 Ex Parte at 6.

[46]   *See* Confidential Attachment A8 (Excerpt from Closed Qwest Post-Launch Issues Log, Address Validation Section, Issues 7-16, and Stare-and-Compare Section, Issues 6, 8).

[47]   "SANO" is the acronym for "Street Address House Number" field on the LSR. The SANO field is the only address field that is required on a Migration-by-TN request.

will "compare street address numbers to the CRIS database" even though "Qwest still seems to be advising CLECs to use the PREMIS address" (which could possibly differ from the address on the CSR). [48] This issue has already been resolved by the parties. [49] Specifically, Qwest has clarified for WorldCom that address information could continue to be obtained from the address validation query (which uses PREMIS) for all activities. However, once Qwest implements Migrate by TN, Qwest validation of the CLEC-supplied address will no longer occur on migration LSRs. Rather, the SANO field will be used only when multiple CSRs exist for the TN provided. In these instances, the SANO will be used by Qwest's systems to isolate the correct CSR that will be used to process the request. Given the limited use of SANO and the unlikelihood of differences between PREMIS and the CSR on the House Number portion of an address, use of PREMIS even in support of Migration by TN LSRs should not prove to be problematic.

In sum, every WorldCom question in connection with this database mismatch issue has been answered and closed in WorldCom's Question Log. [50] There is no reason for WorldCom to belabor this issue here.

3.   Address Validations for Second Lines

WorldCom claims that the requirement that CLECs validate by address, rather than TN, creates an increased potential for errors by WorldCom's service representatives because they must type more keystrokes for addresses than TNs. [51] Qwest already addressed this issue thoroughly in its Reply Comments. [52]

When WorldCom first raised this issue in its comments, Qwest explained that the "near match" capability of its address validation tool – which causes multiple potential responses to be returned when minor keystroke errors are made – renders WorldCom's argument moot. [53] WorldCom now claims that the "near match" function does not help because incorrect addresses can still be validated if, when multiple potential responses are returned by the tool, they are selected by the CLEC service representative. [54] But this can happen for almost any type of query under a wide variety of circumstances. WorldCom's claim regarding the potential for typos therefore is irrelevant. [55]

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[48]   *See* WorldCom March 24 Ex Parte at 6.

[49]   *See* Confidential Attachment A8 (Excerpt from Closed Qwest Post-Launch Issues Log, Address Validation Section, Issues 7-16, and Stare-and-Compare Section, Issues 6, 8).

[50]   *See id.*

[51]   *See* WorldCom March 24 Ex Parte at 6.

[52]   *See* Qwest Reply Comments at 38-39.

[53]   *See id.* at 38.

[54]   *See* WorldCom March 24 Ex Parte at 6.

[55]   Qwest's OSS does more than merely return multiple potential addresses in "near match" situations. It also prompts CLECs in "exact match with supplemental information" situations (*e.g.*, by distinguishing apartment units that are listed at the same address) so that CLECs are aware that multiple customers may

II. & III.   CSR UPDATES (BLOCKING OPTIONS AND OTHER ISSUES)

In its Reply Comments, WorldCom claims that it examined 82 CSRs and found that Qwest failed to update some of those CSRs to include current (1) blocking options, (2) billing address, (3) line status, and (4) service establishment date information.[56] Qwest responded fully to WorldCom's allegations in an *ex parte* filing on March 11, 2003.[57] WorldCom now raises additional claims relating to this issue; but, as explained more fully below, none of these claims negate a finding that Qwest meets the requirements of Section 271.

Blocking Options: WorldCom claims that 17 of the 83 CSRs it examined contained blocking options or features that WorldCom did not order. In its *ex parte* filing of March 11, Qwest explained that these 17 CSRs were updated accurately and that the reason certain blocking options were still on those CSRs was because they were not properly removed by WorldCom.[58] Qwest further explained that it would update its PCAT to better explain how CLECs can order or remove blocking options by utilizing the remarks field and setting the order to manual handling.[59] Qwest has since implemented this PCAT update.

WorldCom now contends that Qwest's updated PCAT proposal is flawed because it requires CLECs to use the "remarks" field to order and remove blocking options, request manual handling for such orders, and will require WorldCom to implement additional coding changes.[60] But the fact that the PCAT proposal includes such requirements is not sufficient to find that it does not meet the requirements of Section 271. FCC precedent states that Qwest must provide CLECs with access to OSS in the "same time and manner" for analogous functions.[61] Here, although CLECs orders are processed manually, WorldCom has not presented any evidence demonstrating that this process is insufficient. Finally, a pending CR, originated by AT&T, will address WorldCom's concerns. Specifically, this CR (SCR022103-01) will enable CLECs to create an end state for adding and/or removing blocking options.[62] This CR, which was recently discussed at

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reside at the same address and select the end user accordingly. This capability is specifically referenced in the Address Validation chapter of the EDI 10.0 Disclosure Document. *See* Qwest IV, Att. 5, App. P, at Chapter 4.

[56]   *See* WorldCom Reply Comments at 14-15; Reply Declaration of Sherry Lichtenberg at ¶¶ 42-45.

[57]   *See* Qwest March 11A Ex Parte at 1-2.

[58]   *See id.* at 1.

[59]   *See id.*

[60]   *See* WorldCom March 24 Ex Parte at 7.

[61]   *See, e.g., Qwest 271 Order* at App. K, ¶ 34; *Virginia 271 Order* at App. F, ¶ 34; *Arkansas/Missouri 271 Order* at App. D, ¶ 34.

[62]   *See* SCR022103-01, *available at* www.qwest.com/wholesale/downloads/2003/cmp/ CLECQwestCMP_SystemsInteractiveReport.PDF?rn=58506.

the monthly CMP Meeting on March 20, 2003, has been given a Level of Effort and is scheduled for prioritization for possible inclusion in IMA release 14.0. [63]

Billing Address: WorldCom claims that only seven of the 82 CSRs it examined incorrectly contained the billing addresses of WorldCom's end users, rather than the billing address of WorldCom. [64] In its *ex parte* filing on March 11, Qwest explained that while there may be variation in Qwest's region as to how billing information is populated on the CSR, this variation does not affect where bills are sent because that determination is made through the summary bill. [65] WorldCom now complains that, if all of this is indeed true, is it unclear what purpose the billing address on the CSR serves in the first place. WorldCom's complaint is, at best, rhetorical and has no connection whatsoever to whether Qwest meets the requirements of Section 271. Billing address is one of several fields on a CSR that Qwest populates. WorldCom has not articulated a single reason why Qwest's conduct in this instance presents a problem.

Line Status Information: WorldCom claims that 48 of the 82 CSRs is examined did not include updated line status information. [66] In its *ex parte* filing on March 11, Qwest explained that each CSR identified by WorldCom in the Central and Western regions contained appropriately updated line status information, and that only in Qwest's Eastern region was line status not updated because line status information currently is not provided on UNE-P accounts. [67] WorldCom now claims that Qwest's explanation was not entirely accurate because WorldCom has since learned in meetings with Qwest that line status information in the Eastern region does exist, but only for "RSID," not "ZSID" accounts. [68] UNE-P services are considered "ZSID" accounts within Qwest's systems. The initial answer Qwest provided to WorldCom was focused on WorldCom's own experience, which is that line status information is not currently provided on UNE-P accounts in the Eastern region. The fact that "RSID" accounts contain line status information is irrelevant to WorldCom at this time. WorldCom thus fails to present facts that demonstrate that Qwest's OSS does not meet the requirements of Section 271.

Service Establishment Date: WorldCom claims that 65 of the 82 CSRs it examined did not include the service establishment date. [69] In its *ex parte* filing on March 11, Qwest explained that the service establishment date appears only when the account is

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[63]   Migrate-as-Specified capability to be included in EDI 12.0 focuses on features and therefore does not include blocking options, which are ordered in a separate field on the LSR. The CR (SCR-022103-01) being processed, however, is specifically designed to include blocking options.

[64]   *See* WorldCom March 24 Ex Parte at 7.

[65]   *See* Qwest March 11A Ex Parte at 2.

[66]   *See* WorldCom March 24 Ex Parte at 7-8.

[67]   *See* Qwest March 11A Ex Parte at 2. Qwest further noted that it is in the process of evaluating whether line status information can be made available on "ZSID" CSRs in the Eastern region.

[68]   *See* WorldCom March 24 Ex Parte at 8.

[69]   *See id.*

active, and that when Qwest investigated WorldCom's allegation several weeks ago, Qwest found that all of WorldCom's active CSRs had service establishment dates. [70] WorldCom now claims that this explanation differs from an explanation provided by Qwest in a recent meeting – that the service establishment date appears on all CSRs but in different places. [71] But the explanation Qwest provided to WorldCom at that meeting . responded only to WorldCom's question as to where the service establishment date is located on the CSR when it appears (*i.e.*, when the account is active). It seems that WorldCom simply misunderstood Qwest's reply and the context in which it was provided.

IV.   SUBMITTING SUPPLEMENTAL ORDERS

WorldCom claims that the process Qwest has in place to permit CLECs to submit supplemental orders before a CSR has been updated "does not work." [72] But the only reason the supplemental order process does not work for WorldCom is because of the way WorldCom had coded its EDI. Indeed, WorldCom told Qwest that it has developed its systems to disallow subsequent conversion orders once a completion notice has been received for the original conversion.

Qwest has provided the Commission with considerable information in various filings about the process that can be used to submit supplemental orders before a CSR has been updated. [73] This information also can be found on Qwest's Wholesale Website. [74] Moreover, Qwest has provided this information to WorldCom on numerous occasions. There simply is no reason for WorldCom to continue to belabor this point. Indeed, other CLECs have submitted subsequent LSRs before the CSR has posted without incident. [75]

V.   CUSTOMER CODE REQUIREMENT

WorldCom alleges that Qwest has provided it with inconsistent guidance as to the source of information WorldCom should use to obtain customer codes for its orders. [76] WorldCom also claims that Qwest was not able to identify for its those situations in which the customer code on the SOC is not reliable. [77]

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[70]   *See* Qwest March 11A Ex Parte at 2.

[71]   *See* WorldCom March 24 Ex Parte at 8.

[72]   *See id.*

[73]   *See, e.g.,* Qwest March 18A Ex Parte; Qwest Reply Comments at 39; *see also* Qwest II OSS Reply Declaration at ¶ 231; Qwest I OSS Reply Declaration at ¶ 147.

[74]   *See* www/qwest.com/wholesale/downloads/2002/021004/11_0_Frequently_Asked_Questions.doc.

[75]   Examples of subsequent LSRs submitted by 7 different CLECs, via EDI and GUI, can be found in Confidential Attachment A9.

[76]   *See* WorldCom March 24 Ex Parte at 9-10.

[77]   *See id.*

It is worth noting at the outset that Qwest does not require CLECs to submit customer codes on all of their orders; rather, Qwest requires CLECs to submit customer codes only when there are multiple CSRs on the account at the time the order is submitted. Because returns of multiple CSRs occur only rarely, the concerns expressed by WorldCom are minor in the context of this Section 271 proceeding. [78]

In an earlier *ex parte* filing, Qwest explained that the account number provided on the SOC is the most current account number known to Qwest at the time the order completes in the SOP. [79] Qwest further explained that in certain limited instances, the billing process may cause the customer code on the posted CSR to differ from the one originally sent on the SOC. [80] WorldCom claims that, when asked at a recent meeting, Qwest could not articulate the scenarios in which this might occur. [81] But at that meeting, Qwest did indeed explain to WorldCom the majority of scenarios in which the customer code could change subsequent to the SOC being issued. [82] Qwest subsequently pointed WorldCom to the IMA User's Guide, which contains all but one of the scenarios in which the customer code could change after the SOC is issued.

As noted in Qwest's March 13 *ex parte* filing, "Posted to be Billed" Status Updates will provide CLECs with consistent customer code information incorporating changes to those codes that occasionally may result from the bill posting process. [83] WorldCom claims, however, that Qwest informed WorldCom in recent discussions that Qwest is not certain that the customer code will indeed remain fixed after the bill posting process. But this simply is untrue. Qwest explained to WorldCom during the March 13, 2003, daily operational support call that the customer code that will be put on the "Posted to be Billed" status update will stay fixed after the bill posting process.

WorldCom also claims that, even if the revised "Posted to Be Billed" Status Update process works, it is too complex for CLECs to code into their EDI. But this process is not complex at all. CLECs can readily filter the Status Updates they receive and process only "Posted to Be Billed" Status Updates. Each type of Status Update contains a consistent, unique status description. Because this status description is unique to the status type, a CLEC's interface could filter the desired notices simply based on the status description.

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[78]   For example, in February 2003, only 4.6% of EDI 11.0 and 1.0% of EDI 10.0 pre-order transactions returned multiple CSRs.

[79]   *See* Qwest March 13A Ex Parte at 1.

[80]   *See id.*

[81]   *See* WorldCom March 24 Ex Parte at 9-10.

[82]   *See* Confidential Attachment A10 (Excerpt from Open WorldCom Question Log, Customer Code Section, Issue 2).

[83]   *See* Qwest March 13A Ex Parte at 1-2.

VI.   DAILY USAGE FILE ("DUF") ISSUES

The WorldCom March 24 Ex Parte alleges that aspects of Qwest's DUF do not meet the requirements of Section 271. " But the majority of WorldCom's complaints simply repeat the allegations made in WorldCom's Reply Comments, to which Qwest already responded in an *ex parte* filing on March 10, 2003. " To the extent WorldCom's March 24 Ex Parte responds to Qwest's March 10 filing or raises new issues, we respond below.

Transmitting Multiple Pay-Per-Use Feature Codes: WorldCom alleges that Qwest transmits up to five different codes on the DUF designating that a "pay-per-use" feature was used, but that Qwest does not identify the meaning of each code, which WorldCom believes is necessary to determine whether the call can be billed to the end user. This is basically the same claim that WorldCom made in its Reply Comments, and to which Qwest already has responded. "

As explained in Qwest's March 10A Ex Parte, the codes Qwest transmits on the DUF to reflect that a "pay-per-use" feature was used come straight from the AMA record provided by the network switch. " Both the codes and Qwest's practice of transmitting them comply with industry guidelines. " WorldCom claims that while Qwest's practices may comply with industry standards, Qwest has not documented the meaning of each code, which WorldCom believes "is necessary to determine whether the calls are billable." " But the purpose and meaning of all "pay-per-use" feature codes is readily available to CLECs in Volume V of Telcordia Technologies's Special Report (SR-69), titled "Comptroller Automatic Message Accounting Format Description (CAFD)," which is publicly available. Thus, WorldCom has access to the necessary documentation to understand the meaning of the "pay-per-use" codes that Qwest transmits on the DUF.

WorldCom claims to be confused by Qwest's use of different codes for "pay-per-use" feature, at least in part because "[n]o other BOC uses multiple codes." " To the extent different codes for a "pay-per-use" feature appear, it is likely because different circumstances occurred when the "pay-per-use" feature was used. Regardless, if

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[84]   *See* WorldCom March 24 Ex Parte at 10-11.

[85]   *See* Qwest March 10A Ex Parte at 1-3.

[86]   *See* WorldCom Reply Comments at 11; Lichtenberg Reply Declaration at ¶ 37.

[87]   *See* Qwest March 10A Ex Parte at 1.

[88]   *See id.* In researching this issue, Qwest recently discovered an anomaly in the Central region in which more general feature codes are sometimes transmitted on the DUF to reflect multiple "pay-per-use" scenarios (though CLECs are still able to determine which "pay-per-use" feature was used). Qwest is investigating this issue and plans to address it shortly. *See* Attachment A11 (Event Notification Associated with PCRM Ticket #6195261).

[89]   *See* WorldCom March 24 Ex Parte at 10.

[90]   *See id.*

WorldCom finds these multiple "pay-per-use" codes confusing, WorldCom should either petition for a change in industry standards or program its own systems to translate these multiple codes into a single code for billing purposes.

Transmitting Rated Pay-Per-Use Feature Codes: WorldCom expresses concern that Qwest's transmission of rated "per-per-use" feature codes – specifically, for "*69" calls – may be inappropriate because "states generally to do not permit billing for *69 interstate calls, as the customer would have no way of knowing in advance that the call was an interstate call for which he would be billed extra."[91] But, Qwest is not restricted in the way it provides the *69 feature for the reasons WorldCom states. Qwest's *69 feature first discloses the number from which the call was made, and only then attempts to connect to that number if the end user elects to return it. The identification of the number from which the call was made is the only portion for which Qwest charges. Qwest's switches therefore allow the use of *69 to return interstate calls, and CLECs can determine when this occurs by virtue of the fact that the DUF record is rated.[92]

Directory Assistance-Completed Calls ("DACC"): WorldCom claims that Qwest's DUF erroneously designates certain DACC calls as "collect calls."[93] This is the same issue that WorldCom raised – and to which Qwest responded – earlier in this proceeding.[94] Specifically, in its March 10A Ex Parte, Qwest explained that after examining WorldCom's DUF files over the past month, Qwest could not find a single example of a DACC record showing the "Message Type" set to "Collect" in the Application states.[95]

WorldCom now acknowledges that this alleged problem has not emerged in any of the Application states.[96] Nevertheless, WorldCom claims that the Commission should take notice of this issue because the regional nature of Qwest's OSS suggests that the issue *could* emerge in those states. The Commission has repeatedly held that it cannot – and will not – entertain speculative claims in Section 271 proceedings.[97] Moreover,

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[91]   *See id.*

[92]   It is unclear to Qwest why WorldCom continues to claim that it has not yet received an explanation for why Qwest sends rated DUF records for the use of the "*69" feature. *See* WorldCom March 24 Ex Parte at 10. Qwest's "Operations Issues Log," which documents the questions raised by WorldCom and responded to by Qwest, reflects that an explanation was provided to WorldCom on March 11, 2003.

[93]   *See* WorldCom March 24 Ex Parte at 10.

[94]   *See* Qwest March 10A Ex Parte at 3.

[95]   *See id.*

[96]   *See* WorldCom March 24 Ex Parte at 10-11.

[97]   *See, e.g., Qwest 271 Order* at ¶ 313 (dismissing as "speculative" AT&T's claim that "Qwest's trunk blockage performance could be indirectly affected 'if CLECs did not contain their growth'"); *Georgia/Louisiana 271 Order* at ¶ 99 (dismissing concerns about UNE rates as "premature, speculative and misplaced"); *Kansas/Oklahoma 271 Order* at ¶ 117 (holding that unsupported claims regarding OSS "do not warrant a finding of checklist noncompliance"); *Texas 271 Order* at ¶ 322 (rejecting as "speculative" CLEC concerns regarding line sharing readiness).